

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00103-JRG-RSP

JURY DEMANDED

**DECLARATION OF KRISTOPHER DAVIS IN SUPPORT OF PLAINTIFF
HEADWATER RESEARCH LLC'S NOTICE OF SUPPLEMENTAL FACTS
REGARDING THE PARTIES' MOTIONS ON STANDING (DKT. 174, 177)**

I, Kristopher Davis, declare and state as follows:

1. I am a member of the State Bar of California, an attorney at the firm of Russ August & Kabat, and counsel of record for Plaintiff Headwater Research LLC in the above-captioned action. I submit this declaration in support of Plaintiff's Notice of Supplemental Facts Regarding the Parties' Motions on Standing (Dkt. 174, 177). I have personal knowledge of the facts set forth herein, and if called upon to testify, could and would testify competently thereto.

2. Attached as Exhibit A is a true and correct copy of the deposition transcript of David Wise in *Headwater Research LLC v. AT&T Services, Inc.*, Case No. 2:23-cv-00397-JRG-RSP, dated January 31, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 7, 2025, at Los Angeles, California.

/s/ Kristopher Davis
Kristopher Davis